



Dr. Oetker Canada

Shiriff

August 8, 2005

Arthur Neal,
Director, Program Administration
National Organic Program
USDA – AMS – TMP – NOP
1400 Independence Ave., SW
Room 4008 – So., Ag Stop 0268
Washington, DC 20250

Re: Docket Number TM-04-07

Dear Mr. Neal,

This is our petition concerning the materials currently on the National List – Docket Number TM-04-07. We support continuing the current list of substances listed in Section 205.605, in particular,

flavors, nonsynthetic sources
sodium bicarbonate
nutrient vitamins and minerals
potassium acid tartrate.

Natural flavors are used in a variety of foods for flavoring purposes. Dry mix products, and in particular baking mixes, require flavors in a powdered form. Common and popular flavors, such as vanilla and lemon, are available in organic versions. However, other less popular flavors, such as apple and caramel, are not. When organic versions are available, there is the requirement to change to these flavors. However, in the meantime many products would not exist without the use of natural flavors. In our case, this would include cake mixes and muffin mixes. Sometimes organic flavors may be available in liquid forms, but the liquid form is not stable during baking or cooking and evaporates. Therefore, spray dried powdered versions are required. These use carriers such as cornstarch or gum Arabic that need to be in an organic form. Sales of flavors in the flavor industry need to be high enough to warrant the use of these organic carriers. As sales increase organic versions become available.

Sodium bicarbonate and potassium acid tartrate are common household leavening agents, known as baking soda and cream of tartar respectively. These substances are used for home baking and are familiar to consumers. These leavening agents, or similar ones, are required to produce most baked goods, with the exception of breads and pizzas, such as waffles, pancakes, muffins, biscuits, cakes, cookies etc. Cream of tartar (potassium acid tartrate) is used as an acid source to react with sodium bicarbonate (baking soda). This produces carbon dioxide that leavens the product and provides an aerated texture. Without leavening agents most baked goods would not

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exist. This would also destroy our baking mix business. Sodium bicarbonate is a natural substance and cream of tartar (potassium acid tartrate) is produced by reacting potassium carbonate with the residue (tartaric acid) left in wine barrels.

Nutrient vitamins and minerals are required when Standards of Identity require enrichment with vitamins and minerals. In the United States, it is optional to add vitamins and iron to wheat flour. However, in Canada, where we are located, flour must be enriched with vitamins and iron. Therefore, without this allowance our baking mix business, which uses flour in all products, would end.

Therefore, without the availability of natural flavors, sodium bicarbonate, potassium acid tartrate, and nutrient vitamins and minerals, many of the products currently on the market will disappear. It should also be noted that these substances cannot be added at a level, together with other nonsynthetic and synthetic substances, of more than 5 %.

If you have any questions about this petition, please contact me by phone at (905) 678-1311 Ext. 224 or by e-mail at penke@oetker.ca.

Sincerely yours,

Peter Enke
Manager, Technical Services